## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO: 00-6309-CR-SEITZ

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UNITED	SIAILS	OI AII	ILINUM.

Plaintiff,

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ANSON KLINGER, et. al.

Defendant.

## UNOPPOSED MOTION TO TRAVEL BEYOND SOUTHERN DISTRICT OF FLORIDA

COMES NOW the Defendant, ANSON KLINGER, by and through his undersigned counsel and hereby moves this Honorable Court to enter an order permitting him to briefly travel outside the jurisdiction of the Southern District of Florida, and in support thereof, would show as follows:

- 1. On October 26, 2000, U.S. Magistrate Seltzer granted the Defendant his release from pretrial detention through a surety bond which included standard conditions of release, including travel restrictions confined within the jurisdiction of this Court.
- 2. On October 7, 2000, the defendant had made travel arrangements for a long weekend vacation from November 10 to 12, 2000, See attached itinerary, marked Exhibit "A". This brief vacation was planned after the defendant learned that he required cancer surgery to remove a tumor from his stomach; that medical procedure is

NEIL M. NAMEROFF, ATTORNEY AT LAW

planned for November 14, 2000. See attached letter from Dr. Cohen, marked Exhibit "B". Naturally, the Defendant has some anxiety and trepidation regarding this surgery and the anticipated biopsy of the tumor.

- 3. On November 6, 2000, the undersigned spoke to U.S. Pretrial Services Officer Gavin Churchill, at which time he stated no objection to these travel plans by the Defendant.
- 4. Also, on November 6, 2000, the undersigned spoke with AUSA Brian McCormick who stated that he had no objection to the relief sought herein.

WHEREFORE the defendant, ANSON KLINGER, respectfully prays that this Honorable Court will permit him to travel outside the Court's jurisdiction from November 10 to 12, 2000 for the above-cited reason.

I HEREBY CERTIFY that a true and correct copy of the foregoing was forwarded to the AUSA Brian McCormick, U.S. Attorney's Office, 299 East Broward Boulevard, Ft. Lauderdale, Florida 33301 this 6 day of November, 2000.

Respectfully submitted,

NEIL M. NAMEROFF, P.A. 100 S.E. 2nd Street, Suite 3350 Miami, Florida 33131 (305) 536-8700

MEK M. NAMEROFF, ESQ.

Fla. Bar No: 230723

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SUBTOTAL 20.00
AIR FARE 202.79
TAX 26.21
TOTAL AIR FARE 229.00
TOTAL INMODECE AMOUNT 249.00
AMOUNT DUE 249.00

AMOUNT IS TO BE PAIN BY: CASH

THANK YOU FOR YOUR AUSINESS

1905 Clint Moore Road, Sulta 301, Boca Raton, Florida 33496 Phone: 561-226-3300 Fax: 561-226-3400

Cardiology

Ronald L. Blankstein, M.D., F.A.C.C.

**Family Practice** 

Kenneth L. Beckett, M.D.

Paul C. Diamond, D.O.

A. J. Peterson, M.D.

Gastroanterology

Radney S. Cahen, M.O.

Internal Medicine

E. Susan Barlsh, M.D.

Mayer E. Cohen, M.D.

Maymon Lyaw, M.D.

Dovid W. Lehman, M.D.

Leslie Lavino, M.D.

Richard A. Levine, M.D., FA.C.P.

Ronnie I. Marris, M.D.

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Michelle P. Schwartz, M.D.

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Only Motheson P.A.C.

Internal Medicine

& Nephrology

Robert M. Colton, M.D.

Bernoid Kominersky, M.D., FA.C.P.

Obstatrics/Gynacology

Samuel L. Heering, M.D.

Rheumatology

David Makover, M.D., FA.C.P.

November 1, 2000

RE: KLINGER, ANSON

To Whom It. May Concern:

My patient, Mr. Anson Klinger, will be undergoing an operation on the November 14, 2000. He will require a four to six day hospital stay and will need to have bed rest for the next three to four weeks.

Please feel free to contact me with any further questions.

Sincerely,

Meyer Cohen, M.D.

MC/ms

EXHIBIT B

Administrative Office

2900 N. Military Trail, Suite 100, Boca Raton, Florida 33431 Phone: 561-912-0057 Fax 561-912-9244

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